



One Lincoln Center | Syracuse, NY 13202-1355 | bsk.com
600 Third Avenue | New York, NY 10016-1915 | bsk.com

STEPHEN A. DONATO, ESQ.
donatos@bsk.com

Syracuse
P: 315.218.8336
F: 315.218.8436

New York
P: 646.253.2351
F: 646.253.2301

April 26, 2025

VIA ELECTRONIC FILING

Honorable Wendy A. Kinsella
United States Bankruptcy Court
Northern District of New York
100 South Clinton Street
Syracuse, New York 13202

Re: *The Roman Catholic Diocese of Syracuse, New York;*
Chapter 11 Case No. 20-30663

Dear Chief Judge Kinsella:

We are pleased to report to the Court that the Catholic Mutual Relief Society of America ("Catholic Mutual"), the Diocese, the Participating Parties, and the Committee (collectively, the "Catholic Mutual Settlement Parties") have reached a settlement whereby Catholic Mutual has agreed to pay \$750,000 to the Trust and, in return, the Diocese, Participating Parties and the Committee have agreed to a release and other provisions requested by Catholic Mutual, all to be more specifically memorialized in the form of a settlement agreement subject to Court approval pursuant to Bankruptcy Rule 9019.

As a settling insurer, Catholic Mutual will not pursue the plan confirmation objections, motions *in limine*, motion for relief from stay seeking arbitration and claim objections it filed and/or joined during the plan confirmation proceedings. Likewise, the Diocese and Committee will not pursue or seek rulings as respects Catholic Mutual or the Catholic Mutual Policies during the plan confirmation proceedings. Catholic Mutual does not anticipate participating in next week's confirmation hearing, but will have an attorney representative present in the courtroom to observe and respond to any questions the Court may have.

The Catholic Mutual Settlement Parties wish to extend their collective gratitude to all of the mediators for their efforts which were ultimately successful in bringing about this mediated resolution.

April 26, 2025
Page 2

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

/s/ Stephen A. Donato
Stephen A. Donato

Reviewed and Agreed:

STINSON LLP

/s/ Robert T. Kugler
Robert T. Kugler

ARENTFOX SCHIFF LLP

/s/ Everett J. Cygal
Everett J. Cygal

cc: All ECF notice parties